

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

FRANCISCO ALMEIDA-LEÓN, WANDA CRUZ
QUILES, La Sociedad Legal de Gananciales entre
ellos, y JUAN ALMEIDA LEON

Plaintiffs

v.

WM Capital Management, Inc.; Juan del Pueblo,
Inc., John Doe, y Fulano de Tal, BM Capital de Tal
y Otros

Defendants

CIVIL ACTION NO. 16-1394 (JAW)

RE STATE COURT ACTION CASE

NO. KAC2016-0027 (806)

BREACH OF CONTRACT; DAMAGES;
LITIGIOUS CREDIT

**LEAVE TO FILE REPLY IN SUPPORT OF REQUEST FOR SANCTIONS AND OTHER
REMEDIES AGAINST THE ALMEIDA PLAINTIFFS AND THEIR ATTORNEYS FILED AT
ECF NO. 515 – AND REQUESTING ORDER**

TO THE HONORABLE COURT:

COMES NOW, WM Capital Management, Inc. (“WM”) by and through its undersigned
counsels, and respectfully requests leave to file a reply in support of its request for sanctions
and making a request for an order against the Almeida Plaintiffs and their attorneys:

1. On September 23, 2021, WM Capital filed its *Request for Coercive and Punitive Sanctions Against the Almeida Plaintiffs and their Attorneys for Violating the TRO*. ECF No. 515.
2. That same day, the Almeida Plaintiffs opposed the aforesaid motion through a *Motion Informing Compliance with Pre TRO Order Never Annulled* (“Response”). ECF No. 517.
3. Pursuant to Local Rule 7(c), a party may file a reply only with prior leave from the Court, within seven (7) days of service of any response to a motion. The period to file the reply to the Response expires today.

4. Accordingly, WM requests leave to file its *Reply in Support of Request for Sanctions and Other Remedies Against the Almeida Plaintiffs and their Attorneys filed at ECF No. 515 – and Requesting Order*, herein included as **Exhibit 1**.

WHEREFORE, WM respectfully requests that this Honorable Court grant it leave, to file its *Reply in Support of Request for Sanctions and Other Remedies Against the Almeida Plaintiffs and their Attorneys filed at ECF No. 515 – and Requesting Order*, herein included as **Exhibit 1**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 30th day of September, 2021.

I HEREBY CERTIFY I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

/s/ Jairo Mellado-Villarreal
USDC No. 208112
jmellado@mellado.com

/s/ Tessie Leal-Garabis
USDC No. 218408
tleal@mellado.com

s/ Héctor Orejuela Dávila
USDC-PR No. 301111
horejuela@mellado.com

Attorneys for WM Capital Management
MELLADO & MELLADO-VILLARREAL
165 Ponce de León Ave., Suite 102
San Juan, Puerto Rico 00917-1235
Tel. 787-767-2600/Fax 787-767-2645